

1 THE HONORABLE MARSHA J. PECHMAN

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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON

8 KATHY BARR,

9 Plaintiff,

10 v.

11 C&D ZODIAC, INC., a Delaware
12 corporation registered in Washington and
13 doing business in Washington State;
14 SAFRAN USA, INC., a Delaware
15 corporation registered in Washington and
16 doing business in Washington State;
17 ZODIAC CABIN & STRUCTURES, LLC,
18 a Delaware limited liability company
19 registered in Washington and doing
20 business in Washington State,

21 Defendants.

No. 2:18-cv-00344

STIPULATION AND ORDER FOR
DISMISSAL AS TO DEFENDANTS
ZODIAC CABIN & STRUCTURES
SUPPORT LLC AND SAFRAN USA, INC.

NOTE ON MOTION CALENDAR:

March 15, 2018

19 Plaintiff Kathy Barr and defendants C&D Zodiac, Inc. and Zodiac Cabin & Structures
20 Support LLC (erroneously sued by Plaintiff as "ZODIAC CABIN & STRUCTURES, LLC")
21 stipulate and agree, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), to the dismissal
22 of all claims by plaintiff Kathy Barr against defendant Zodiac Cabin & Structures Support LLC
23 and defendant Safran USA, Inc., without costs to any party. This Stipulation is signed by all
24 parties who have appeared. Safran USA, Inc. has not appeared in this action. Voluntary
25 dismissal of all claims against one or more defendants is proper under Rule 41. See *Gen. Signal*
26 *Corp. v. MCI Telecommc'ns Corp.*, 66 F.3d 1500, 1513 (9th Cir. 1995) ("Rule 41 is reserved for

STIPULATION & ORDER DISMISSING
ZODIAC CABIN AND SAFRAN
(No. 2:18-cv-00344) -1

1 circumstances in which the result of the alleged dismissal is that one or all of the defendants are
2 released from the action.”), cert. denied, 516 U.S. 1146 (1996).

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4 RESPECTFULLY SUBMITTED this 15th day of March, 2018.

5 s/ Richard Hughes, WSBA No. 22897
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9 Attorneys for Plaintiff Kathy Barr

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Attorneys for Defendant C&D Zodiac, Inc. and
Zodiac Cabin & Structures Support LLC

13 **ORDER**

14 Having reviewed the stipulation, it is so ordered.

15 DATED this 27th day of March, 2018.

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18 Marsha J. Pechman
19 United States District Judge

1 **CERTIFICATE OF SERVICE**

2 On March 15, 2018, I caused to be served upon counsel of record, at the addresses stated
3 below, via the method of service indicated, a true and correct copy of the foregoing document.

4
5 Richard Hughes, WSBA #22897
6 Hughes Law Group, PLLC
7 415 N. 4th Street
8 Mount Vernon, WA 98273
9 Telephone: (206) 336-6120
Email: Richard@hughes-law-group.com

☐ Via Hand Delivery
☐ Via U.S. Mail, 1st Class,
Postage Prepaid
☐ Via Overnight Delivery
☐ Via Facsimile
☒ Via E-Filing
☒ Via E-mail

Attorneys for Plaintiff Kathy Barr

10 I certify under penalty of perjury under the laws of the State of Washington that the
11 foregoing is true and correct.

12 DATED this 15th day of March, 2018.

13
14 s/ Janet Davenport
Janet Davenport, Legal Practice Assistant